

1 David M. Tall
2 Oseran, Hahn, P.S.
3 10900 NE Fourth Street, Suite 1430
Bellevue, WA 98004
(425) 455-3900

Hon. Marc Barreca
Hearing Date: September 5, 2014 @ 9:30 am
Response Date: August 29, 2014

9
10 UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

11 IN RE:
12 SAM A. ADAMS and ERIKA M. ADAMS,
13 Debtors.

No. 14-15003-MLB

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15 **CREDITOR H-P PROPERTIES/ALL
STAR, LLC'S MOTION FOR
RELIEF FROM STAY BASED UPON
DEBTORS FAILURE TO MAKE
PAYMENTS AS COMPELLED BY
COURT ORDER**

16 **NOTICE OF HEARING**

17 TO: THE CLERK OF THE COURT
18 AND TO: Sam A. Adams and Erika M. Adams, Debtors
Lawrence K. Engel, Attorney for Debtor

19 PLEASE TAKE NOTE that Creditor H-P Properties/All Star, LLC ("Creditor"), Landlord
20 of those premises located at 2629 SW Andover Street, Seattle, Washington 98126, through its
21 attorney of record, Oseran Hahn, P.S., David M. Tall, of counsel will present and issue of law in
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CREDITOR H-P PROPERTIES/ALL STAR, LLC'S MOTION
FOR RELIEF FROM STAY BASED ON DEBTORS FAILURE
TO MAKE PAYMENTS AS COMPELLED BY COURT ORDER-

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#98431.008

OSERAN HAHN P.S.
10900 NE Fourth Street #1430
Bellevue WA 98004
Phone: (425) 455-3900
Facsimile: (425) 455-9201

1 this case which will be heard on the date below Clerk of the Court is requested to note this issue on
2 Judge Barreca's calendar for that day.

3 Hearing Date and Time. September 5, 2014 @ 9:30 a.m.

4 Location. U.S. Bankruptcy Court, 700 Stewart St., Courtroom 7106, Seattle, WA.

5 Nature of Motion. The Motion is for Relief from Stay based upon Debtor's failure to
6 comply with this Court's order of August 11, 2014. The motion is sought pursuant to the authority
7 granted under 11 U.S.C § 362 and 365.

8 Your response to this motion must be filed and served at least seven days prior to the date
9 of the hearing; if no response is filed within this time the Court may in its discretion grant the
10 motion prior to the hearing without further notice.

11 **MOTION**

12 COMES NOW Creditor by and through its attorneys of record, Oseran Hahn, P.S., David
13 M. Tall of counsel, and moves the Court for entry of an order for relief from stay to allow the
14 Creditor to pursue its state remedies including seeking an order for a writ of restitution of the
15 subject premises based upon Debtor's failure to comply with this Court's Order, entered of
16 record on August 11, 2014.

17 This Motion is based upon the Declarations of John Pietromonaco and David M. Tall
18 filed contemporaneously herewith.

19 DATED: August 13, 2014.

20 OSERAN, HAHN, P.S.

21 By _____
22 DAVID M. TALL, WSBA #12849

Attorney for H-P PROPERTIES/ALL STAR, LLC

CREDITOR H-P PROPERTIES/ALL STAR, LLC'S MOTION
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